

EXHIBIT DDD

From: Pocha, Madhu <mpocha@omm.com>
Sent: Wednesday, March 20, 2019 12:48 PM
To: Papez, Matthew E.; csloane@whitecase.com; Sooknanan, Sparkle L.; wdalsen@proskauer.com
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Subject: RE: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

Hi Matt,

We agree with this proposal without waiver of our privilege and other objections, as stated in the objections AAFAF served on March 6, 2019.

Thanks,
Madhu

From: Papez, Matthew E. <mpapez@jonesday.com>
Sent: Tuesday, March 19, 2019 11:17 AM
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Subject: RE: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566 (LTS)

Madhu,
I'm following up on AAFAF's objections to Topics 2, 5, and 7 of the Movants' Rule 30(b)(6) deposition subpoena, which is one of the issues we discussed during yesterday's meet & confer.

AAFAF has agreed to produce a witness on Topics 1, 3, and 6, which are:

- Topic 1. The background, drafting, preparation, enactment, passage, approval, implementation or effect of Joint Resolution 188, including any Analysis of Joint Resolution 188's effect upon (a) Contributions, (b) the Pledged Property, or (c) the ERS Bondholders' Security Interest.
- Topic 3. The Joint Resolution 188 Mechanisms.
- Topic 6. The background, drafting, preparation, enactment, passage, approval or implementation of Act 106-2017, including any Analysis of Act 106-2017's effect upon (a) Contributions, (b) the Pledged Property, or (c) the ERS Bondholders' Security Interest.

However, AAFAF has objected to producing a witness on Topics 2, 5, and 7, which are:

- Topic 2. Communications between You and anyone Concerning the background, drafting, preparation, enactment, approval, implementation or effect of Joint Resolution 188.
- Topic 5. Communications between You and anyone Concerning the Joint Resolution 188 Mechanisms.
- Topic 7. Communications between You and anyone Concerning the background, drafting, preparation, enactment, approval, implementation or effect of Act 106-2017.

In an effort to resolve a potential dispute about AAFAF's refusal to designate a witness on Topics 2, 5, and 7, we make the following proposal:

- Movants will not to move to compel on Topics 2, 5, and 7 at this time, if AAFAF agrees that questions regarding communications about Joint Resolution 188, the Joint Resolution 188 Mechanisms, and Act 106-2017 are not beyond the scope of Topics 1, 3, and 6, respectively.
- AAFAF's privilege objections to questions about communications about Joint Resolution 188, the Joint Resolution 188 Mechanisms, and Act 106-2017 would be deferred for the time being, pending further guidance from the Court about the privilege issues that the parties have been discussing more generally.
- Finally, Movants will reserve their rights to move to compel on Topics 2, 5, and 7 at a later time, if needed. Similarly, AAFAF will reserve its right to move for a protective order on Topics 2, 5, and 7 at a later time, if needed.

Please let us know whether you agree to this proposal.

Thanks,
Matt

Matthew E. Papez (bio)
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